

**U.S. DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

STRIKE 3 HOLDINGS, LLC, a  
Delaware corporation,

Plaintiff,

vs.

JOHN DOE, subscriber assigned IP  
address 73.225.38.130,

Defendant.

Case No. 2:17-cv-01731-TSZ

DEFENDANT'S REQUESTS  
FOR ADMISSION TO  
PLAINTIFF

SET: ONE

**PROPOUNDING PARTY: JOHN DOE, subscriber assigned IP address  
73.225.38.130**

**RESPONDING PARTY: STRIKE 3 HOLDINGS, LLC**

**SET NUMBER: ONE (1)**

REQUESTS FOR ADMISSION- SET 1  
CASE No. 2:17-cv-01731-TSZ

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**EDMONDSON IP LAW**  
Venture Commerce Center, 3699 NE John Olsen Ave  
Hillsboro, Oregon 97124  
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**DEFENDANT’S REQUESTS FOR ADMISSION TO PLAINTIFF**  
**SET ONE**

Pursuant to Fed.R.Civ.P. 36, Defendant, JOHN DOE subscriber assigned IP address 73.225.38.130 (“DOE”), hereby requests Plaintiff, STRIKE 3 HOLDINGS, LLC (“S3H”) answer the following admissions, under oath, and served within 30 days on Defendant’s counsel by mail at 3699 NE John Olsen Ave., Hillsboro, Oregon 97124, and by email to [jcedmondson@edmolaw.com](mailto:jcedmondson@edmolaw.com), with a copy to [kiren@edmolaw.com](mailto:kiren@edmolaw.com).

**DEFINITIONS**

1. “Complaint” shall mean the complaint, filed in this action on November 16, 2017, including attached exhibits. Complaint is attached as Exhibit 1 hereto.

2. If not expressly stated, “control” means in your possession, custody, or control and includes documents and things in the possession, custody, or control of any other person in your house, apartment, dwelling, and/or business.

3. “Exhibit A” refers to Exhibit A attached to the Complaint.

4. “Infringement Detection” shall mean any computer program, manual method, automated method, third party service, and/or any process for determining that the Defendant has infringed the Plaintiff’s Works as alleged in the Complaint.

5. “IP Address” means the IP address 73.225.38.130.

6. “IPP” means Plaintiff’s investigator, IPP International U.G.

7. “Plaintiff” shall mean “STRIKE 3 HOLDINGS, LLC”, the Plaintiff in this action.

8. “Related to” and “in relation to” shall mean directly or indirectly, refer to, reflect, describe, pertain to, arise out of or in connection with, or in any way legally, logically, or factually be connected with the matter discussed.

1 9. “STRIKE 3 HOLDINGS, LLC” and “S3H” refers to Plaintiff, Strike 3  
2 Holdings, LLC, including its employees, agents, servants, subsidiaries, parent  
3 company, affiliated company, and any other person or entity acting or purporting to  
act on its behalf or under its control.

4 10. “Subject Hash” means each of the 80 hashes identified in Exhibit A,  
5 Column 2, labeled Hash. Each Subject Hash will be referred to by the number  
6 assigned to it in Exhibit A. For example, Subject Hash 1 refers to the hash  
referenced in row 1, column 2 of Exhibit A.

7 11. “Used” means connected the device to a computer or other device,  
8 connected the device to a power source, stored files on the device, copied files to  
9 the device, copied files from the device, erased files from the device, accessed files  
10 on the device, viewed files on the device, or engaged in any combination of the  
foregoing.

11 12. “Work” means each of the 80 works identified in Exhibit A, Column  
12 1, labeled Work. Each Work will be referred to by the number assigned to it in  
13 Exhibit A. For example, Work 1 refers to the Work referenced in row 1 of Exhibit  
A.

14 13. “You” or “Your” refers to the person upon whom this request was  
15 propounded and any other person(s) or entity(ies) acting or purporting to act on  
16 your behalf or under your control.

17 14. The words “and” and “or” shall be construed either disjunctively or  
18 conjunctively as necessary to bring within the scope hereof any responses to  
19 interrogatories, documents, or communications, which might otherwise be  
20 construed to be outside the scope hereof.

**REQUESTS FOR ADMISSION**

**REQUEST 1:** Admit that a monthly subscription to [www.blacked.com](http://www.blacked.com) is \$29.95.

**REQUEST 2:** Works 4, 5, 6, 9, 13, 16, 22, 23, 26, 33, 35, 46, 48, 54, 57, 60, 63, 65, 66, 71, 72, 73, 77, and/or 78 are available to view and download for a monthly subscription to [www.blacked.com](http://www.blacked.com).

**REQUEST 3:** Admit that a monthly subscription to [www.tushy.com](http://www.tushy.com) is \$29.95.

**REQUEST 4:** Admit that Works 1, 2, 7, 8, 12, 14, 17, 21, 24, 25, 27, 29, 31, 32, 37, 40, 49, 52, 53, 55, 58, 59, 62, 64, 67, 69, 70, 74, 75, 76, and/or 79 are available to view and download for a monthly subscription to [www.tushy.com](http://www.tushy.com).

**REQUEST 5:** Admit that a monthly subscription to [www.vixen.com](http://www.vixen.com) is \$29.95.

**REQUEST 6:** Admit that Works 3, 10, 11, 15, 18, 19, 20, 28, 30, 34, 36, 38, 39, 41, 42, 43, 44, 45, 47, 50, 51, 56, 61, 68, and/or 80 are available to view and download for a monthly subscription to [www.vixen.com](http://www.vixen.com).

**REQUEST 7:** Admit that the UTC date and time in column 4 of Exhibit A corresponds to the date at which IPP observed the corresponding Work being downloaded by the IP Address.

**REQUEST 8:** Admit that each Subject Hash corresponds to a Work that is at least 30 mins in length.

Dated: June 19, 2018

Respectfully submitted,  
/s/ J. Curtis Edmondson  
Attorney for DOE

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**UNITED STATES DISTRICT COURT**  
**WESTERN DISTRICT OF WASHINGTON**  
**AT SEATTLE**

STRIKE 3 HOLDINGS, LLC, a Delaware corporation,

Plaintiff,

vs.

JOHN DOE subscriber assigned IP address 73.225.38.130,

Defendant.

Case No.:

**COMPLAINT FOR COPYRIGHT INFRINGEMENT**

**JURY DEMAND**

Plaintiff, Strike 3 Holdings, LLC, brings this complaint against John Doe subscriber assigned IP address 73.225.38.130, and alleges as follows:

**Introduction**

1. This is a case about the ongoing and wholesale copyright infringement of Plaintiff's motion pictures by Defendant, currently known only by an IP address.

2. Plaintiff, Strike 3 Holdings, LLC ("Strike 3" or "Plaintiff") is the owner of award winning, critically acclaimed adult motion pictures.

3. Strike 3's motion pictures are distributed through the *Blacked*, *Tushy*, and *Vixen* adult websites and DVDs. With more than 20 million unique visitors to its websites each month, the brands are famous for redefining adult content, creating high-end, artistic, and

COMPLAINT

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1 performer-inspiring motion pictures produced with a Hollywood style budget and quality.

2 4. Defendant is, in a word, stealing these works on a grand scale. Using the  
3 BitTorrent protocol, Defendant is committing rampant and wholesale copyright infringement by  
4 downloading Strike 3's motion pictures as well as distributing them to others. Defendant did  
5 not infringe just one or two of Strike 3's motion pictures, but has been recorded infringing 80  
6 movies over an extended period of time.

7 5. Although Defendant attempted to hide this theft by infringing Plaintiff's content  
8 anonymously, Defendant's Internet Service Provider ("ISP"), Comcast Cable Communications,  
9 LLC ("Comcast Cable"), can identify Defendant through his or her IP address 73.225.38.130.

10 6. This is a civil action seeking damages under the United States Copyright Act of  
11 1976, as amended, 17 U.S.C. §§ 101 et seq. (the "Copyright Act").

12 **Jurisdiction and Venue**

13 7. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C.  
14 § 1331 (federal question); and 28 U.S.C. § 1338 (jurisdiction over copyright actions).

15 8. This Court has personal jurisdiction over Defendant because Defendant used an  
16 Internet Protocol address ("IP address") traced to a physical address located within this District  
17 to commit copyright infringement. Therefore (i) Defendant committed the tortious conduct  
18 alleged in this Complaint in this State; and, (ii) Defendant resides in this State and/or;  
19 (iii) Defendant has engaged in substantial – and not isolated – business activity in this State.

20 9. Plaintiff used IP address geolocation technology by Maxmind Inc. ("Maxmind"),  
21 an industry-leading provider of IP address intelligence and online fraud detection tools, to  
22 determine that Defendant's IP address traced to a physical address in this District. Over 5,000  
23 companies, along with United States federal and state law enforcement, use Maxmind's GeoIP  
24 data to locate Internet visitors, perform analytics, enforce digital rights, and efficiently route  
25 Internet traffic.

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10. Pursuant to 28 U.S.C. § 1391(b) and (c), venue is proper in this district because: (i) a substantial part of the events or omissions giving rise to the claims occurred in this District; and, (ii) the Defendant resides (and therefore can be found) in this District and resides in this State. Additionally, venue is proper in this District pursuant 28 U.S.C. § 1400(a) (venue for copyright cases) because Defendant or Defendant's agent resides or may be found in this District.

### **Parties**

11. Strike 3 is a Delaware limited liability company located at 2140 S. Dupont Hwy, Camden, DE.

12. Plaintiff currently can only identify Defendant by his or her IP address. Defendant's IP address is 73.225.38.130. Defendant's name and address can be provided by Defendant's Internet Service Provider.

### **Factual Background**

#### ***Plaintiff's Award-Winning Copyrights***

13. Strike 3's subscription based websites proudly boast a paid subscriber base that is one of the highest of any adult-content sites in the world. Strike 3 also licenses its motion pictures to popular broadcasters and Strike 3's motion pictures are the number one selling adult DVDs in the United States.

14. Strike 3's motion pictures and websites have won numerous awards, such as "best cinematography," "best new studio," and "adult site of the year." One of Strike 3's owners, two-time director of the year Greg Lansky, has been dubbed the adult film industry's "answer to Steven Spielberg."

15. Strike 3's motion pictures have had positive global impact, leading more adult studios to invest in better content, higher pay for performers, and to treat each performer with respect and like an artist.

16. Unfortunately, Strike 3, like a large number of other makers of motion picture

1 and television works, has a major problem with Internet piracy. Often appearing among the  
2 most infringed popular entertainment content on torrent websites, Strike 3's motion pictures are  
3 among the most pirated content in the world.

4 ***Defendant Used the BitTorrent File Distribution Network to Infringe Plaintiff's Copyrights***

5 17. BitTorrent is a system designed to quickly distribute large files over the Internet.  
6 Instead of downloading a file, such as a movie, from a single source, BitTorrent users are able  
7 to connect to the computers of other BitTorrent users in order to simultaneously download and  
8 upload pieces of the file from and to other users.

9 18. To use BitTorrent to download a movie, the user has to obtain a "torrent" file for  
10 that movie, from a torrent website. The torrent file contains instructions for identifying the  
11 Internet addresses of other BitTorrent users who have the movie, and for downloading the  
12 movie from those users. Once a user downloads all of the pieces of that movie from the other  
13 BitTorrent users, the movie is automatically reassembled into its original form, ready for  
14 playing.

15 19. BitTorrent's popularity stems from the ability of users to directly interact with  
16 each other to distribute a large file without creating a heavy load on any individual source  
17 computer and/or network. It enables Plaintiff's motion pictures, which are often filmed in state  
18 of the art 4kHD, to be transferred quickly and efficiently. Moreover, BitTorrent is designed so  
19 that the more files a user offers for download to others, the faster the user's own downloads  
20 become. In this way, each user benefits from illegally distributing other's content and violating  
21 copyright laws.

22 20. Each piece of a BitTorrent file is assigned a unique cryptographic hash value.

23 21. The cryptographic hash value of the piece ("piece hash") acts as that piece's  
24 unique digital fingerprint. Every digital file has one single possible cryptographic hash value  
25 correlating to it. The BitTorrent protocol utilizes cryptographic hash values to ensure each  
26 piece is properly routed amongst BitTorrent users as they engage in file sharing.

22. The entirety of the digital media file also has a unique cryptographic hash value (“file hash”), which acts as a digital fingerprint identifying the digital media file (e.g. a movie). Once infringers complete the downloading of all pieces which comprise a digital media file, the BitTorrent software uses the file hash to determine that the file is complete and accurate.

23. Defendant used the BitTorrent file network to illegally download and distribute Plaintiff’s copyrighted motion pictures.

24. Plaintiff’s investigator, IPP International U.G. (“IPP”) established direct TCP/IP connections with the Defendant’s IP address as outlined on Exhibit A while Defendant was using the BitTorrent file distribution network.

25. While Defendant was infringing, IPP downloaded from Defendant one or more pieces of the digital media files containing Strike 3’s motion pictures listed on Exhibit A (“Works”).

26. A full copy of each digital media file was downloaded from the BitTorrent file distribution network, and it was confirmed through independent calculation that the file hash correlating to each file matched the file hash downloaded by Defendant.

27. Defendant downloaded, copied, and distributed a complete copy of Plaintiff’s Works without authorization.

28. At no point was Plaintiff’s copyrighted content uploaded by IPP to any BitTorrent user.

29. The digital media files have been verified to contain a digital copy of a motion picture that is identical (or alternatively, strikingly similar or substantially similar) to Plaintiff’s corresponding original copyrighted Works.

30. Defendant’s infringement is continuous and ongoing. Absent this lawsuit, Plaintiff knows of no way to effectively prevent Defendant from infringing Plaintiff’s motion pictures.

31. Plaintiff owns the copyrights to the Works and the Works have either been

1 registered with the United States Copyright Office or have pending copyright registrations. The  
2 United States Copyright Office registration information for the Works, including the registration  
3 number, is outlined on Exhibit A.

4 32. For Plaintiff's Works that are still pending registration, a complete application,  
5 fees, and deposit materials for copyright registration have been received by the Copyright  
6 Office in compliance with the Copyright Act, 17 U.S.C. §§ 101, et seq. The application number  
7 is listed on Exhibit A.

8 33. Plaintiff is entitled to seek statutory damages and attorneys' fees under 17 U.S.C.  
9 § 501 of the United States Copyright Act.

### 10 **Cause of Action**

#### 11 **Direct Copyright Infringement**

12 34. The allegations contained in paragraphs 1-33 are hereby re-alleged as if fully set  
13 forth herein.

14 35. Plaintiff is the owner of the Works, which is an original work of authorship.

15 36. Defendant copied and distributed the constituent elements of Plaintiff's Works  
16 using the BitTorrent protocol.

17 37. At no point in time did Plaintiff authorize, permit or consent to Defendant's  
18 distribution of its Works, expressly or otherwise.

19 38. As a result of the foregoing, Defendant violated Plaintiff's exclusive right to:

20 (A) Reproduce its Works in copies, in violation of 17 U.S.C. §§ 106(1) and 501;

21 (B) Distribute copies of the Works to the public by sale or other transfer of  
22 ownership, or by rental, lease or lending, in violation of 17 U.S.C. §§ 106(3) and 501;

23 (C) Perform the copyrighted Works, in violation of 17 U.S.C. §§ 106(4) and 501, by  
24 showing the Works' images in any sequence and/or by making the sounds accompanying the  
25 Works' audible and transmitting said performance of the work, by means of a device or process,  
26 to members of the public capable of receiving the display (as set forth in 17 U.S.C. § 101's

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1 definitions of “perform” and “publically” perform); and

2 (D) Display the copyrighted Works, in violation of 17 U.S.C. §§ 106(5) and 501, by  
3 showing individual images of the works non-sequentially and transmitting said display of the  
4 works by means of a device or process to members of the public capable of receiving the  
5 display (as set forth in 17 U.S.C. § 101’s definition of “publicly” display).

6 39. Defendant’s infringements were committed “willfully” within the meaning of 17  
7 U.S.C. § 504(c)(2).

8 **Jury Demand**

9 Pursuant to Fed. R. Civ. P. 38, Plaintiff respectfully demands a trial by jury of all issues  
10 so triable.

11 **Prayer for Relief**

12 WHEREFORE, Plaintiff respectfully requests that the Court:

13 (A) Permanently enjoin Defendant from continuing to infringe Plaintiff’s  
14 copyrighted Works;

15 (B) Order that Defendant delete and permanently remove the digital media files  
16 relating to Plaintiff’s Works from each of the computers under Defendant’s possession, custody  
17 or control;

18 (C) Order that Defendant delete and permanently remove the infringing copies of the  
19 Works Defendant has on computers under Defendant’s possession, custody or control;

20 (D) Award Plaintiff statutory damages per infringed work pursuant to 17 U.S.C. §  
21 504(a) and (c);

22 (E) Award Plaintiff its reasonable attorneys’ fees and costs pursuant to 17 U.S.C. §  
23 505; and

24 (F) Grant Plaintiff any other and further relief this Court deems just and proper.

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27 COMPLAINT

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1 DATED this 16<sup>th</sup> day of November 2017

2 **FOX ROTHSCHILD LLP**

3 By: /s/ Bryan J. Case  
4 Bryan J. Case, WSBA #41781  
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10 *Attorneys for Plaintiff*

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27 COMPLAINT

28 **FOX ROTHSCHILD LLP**  
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**Exhibit A to the Complaint****Location:** Federal Way, WA**IP Address:** 73.225.38.130**Total Works Infringed:** 80**ISP:** Comcast Cable

Work	Hash	Site	UTC	Published	CRO App. File Date	CRO Number
1	1BC8C1ADCAA75C3EC9408C8CCBF5147863205E6C	Tushy	09/05/2017 10:40:33	09/03/2017	09/10/2017	PA0002052851
2	0326E8923C58852725F5A7857833A4CD3E715289	Tushy	05/15/2017 04:40:00	05/06/2017	06/15/2017	15389210313
3	039F4779148D3E374D990283A83AC46A0219DAE9	Vixen	05/12/2017 06:25:29	04/19/2017	06/15/2017	15389210409
4	0CDEB18021838E8E2A694A7D16D9A45366CFABB6	Blacked	08/08/2017 21:54:29	08/08/2017	08/17/2017	15732904191
5	1487A26EAAAD70318258AB9F506506A8F293533A	Blacked	05/21/2017 18:02:17	05/05/2017	06/15/2017	PA0002037591
6	1A032CB38BB2AF87DAF2B239A1A17B6C713EBC26	Blacked	08/12/2017 13:46:39	08/03/2017	08/17/2017	15732904092
7	1C2C06D480942F4FE7FDCED4759E93805E02B54B	Tushy	05/24/2017 01:49:12	05/21/2017	06/22/2017	PA0002039282
8	1D1B18BB0C921D6E1A6D148E4542257B42A2469F	Tushy	06/22/2017 08:52:38	06/20/2017	07/06/2017	15584063275
9	1D63168E762F9CB41AE4DBD6646599AD0EFF3911	Blacked	07/10/2017 20:05:40	07/09/2017	08/17/2017	15732782151
10	1D7E521CD7368013A7F1B28494A2AC43D8F99F0E	Vixen	09/03/2017 05:01:06	09/01/2017	09/07/2017	PA0002052845
11	1D7E721AC3B8D955BBCAD8D62F57AF030BD1F315	Vixen	06/06/2017 10:18:02	06/03/2017	07/06/2017	15584691685
12	22883186DAB5FCA92C8513AD939652BCB867FD5C	Tushy	08/21/2017 10:03:46	08/19/2017	08/24/2017	15894022311
13	22C377CC65B1695E6470BFAF967C4C825391EF90	Blacked	08/01/2017 08:09:40	07/29/2017	08/11/2017	PA0002046872
14	24D6E127081B069994E81CA544B8FF3E3A0A33D3	Tushy	05/17/2017 06:35:34	05/16/2017	06/22/2017	PA0002039300
15	258961E123E520633A96CDF11E8E6F60E233C816	Vixen	07/24/2017 17:24:34	07/23/2017	08/10/2017	PA0002046877
16	289FE7D65DFCFACB416832D12862105A2762841A	Blacked	05/12/2017 05:45:47	05/10/2017	06/22/2017	PA0002039285

Work	Hash	Site	UTC	Published	CRO App. File Date	CRO Number
17	31577E16E1B68BF13F30BE538E1BAF66E224726A	Tushy	08/01/2017 05:04:24	07/30/2017	08/11/2017	15711086778
18	322F6ABAB019761A6FF3C1211AF75B28137F013F	Vixen	06/09/2017 20:46:58	06/08/2017	07/06/2017	15584691637
19	337A87F18ACD71687C3733C359197601B44E39FF	Vixen	06/01/2017 09:40:11	05/29/2017	06/22/2017	PA0002039292
20	34452073A3328CE2AF5FC73A5A8DDD4141E85B4A	Vixen	08/23/2017 10:51:56	08/22/2017	09/07/2017	PA0002052852
21	374A3B65D604113BB3880FDACE83FD1EFED3CA7C	Tushy	08/15/2017 12:51:18	08/14/2017	08/17/2017	PA0002048391
22	3945FEF635D609C3FB77DD4762FC2570E7E12D7C	Blacked	05/21/2017 16:45:29	05/20/2017	06/22/2017	PA0002039289
23	408577469D1675504E89F205C619738007D08DD9	Blacked	06/09/2017 20:59:45	06/09/2017	07/06/2017	15584064165
24	4125860EC76C1E0880F652DA94EB84D375A64436	Tushy	08/05/2017 12:02:40	08/04/2017	08/17/2017	15732903865
25	464AB452DA8258FA23BA74830F0D57EE7CA518C5	Tushy	08/26/2017 12:52:10	08/24/2017	08/24/2017	PA0002052837
26	48F5E3FE474EA76DE23D7D0A8F27ADA15F5C98D7	Blacked	07/20/2017 21:22:16	07/19/2017	08/11/2017	PA0002046876
27	49F03BF24CE42C3AFFA968C9CFE37DB55B3B555E	Tushy	09/28/2017 18:38:00	04/26/2017	06/15/2017	PA0002037565
28	4B86BC16D0E5A0983C578B61ED87BC62C55B116A	Vixen	08/14/2017 12:50:09	08/12/2017	08/17/2017	15732986308
29	4F0D3D0FD3F88791F4933080453A052BE6924F22	Tushy	10/12/2017 21:12:29	10/08/2017	10/22/2017	PA0002058298
30	4FAE423CFA8C54409A4658429D7CB2B3E0F2E8B1	Vixen	09/27/2017 02:20:50	09/11/2017	09/20/2017	PA0002052839
31	4FF62836FC3C509617EE5DE7658EAABE045C0BA1	Tushy	09/16/2017 16:46:35	09/13/2017	09/25/2017	15894022635
32	5003D85013A07470D85A3250EF4B3393B6E2CB04	Tushy	07/12/2017 20:00:00	07/10/2017	08/17/2017	15732782072
33	5176733783D1199D43060681D7AE2D4E3B5C9AF9	Blacked	07/19/2017 22:47:58	07/14/2017	08/11/2017	PA0002046878
34	53FF1B4BD8FB69630FE0A67611FE747F902F6874	Vixen	07/20/2017 21:17:40	07/18/2017	08/10/2017	PA0002046875

Work	Hash	Site	UTC	Published	CRO App. File Date	CRO Number
35	5A06B4EA4DB48984499F2E9EA7213220E835089D	Blacked	06/16/2017 14:31:45	06/14/2017	07/06/2017	15584064117
36	5AA7FC6E46AEF9EC1227A939EADB3351AD495F12	Vixen	08/08/2017 23:27:09	08/07/2017	08/17/2017	15732904013
37	5C208E2ABF6083135CA52776A02D87442F215D60	Tushy	06/19/2017 18:46:28	06/15/2017	07/06/2017	15583057198
38	64683F0353A903719B39E742A35B975B17849BF7	Vixen	09/01/2017 13:56:38	07/28/2017	08/10/2017	PA0002046871
39	6503CB2EAECE7FA2F1D71B98E41D6D845BF7B794	Vixen	08/18/2017 16:01:01	08/17/2017	08/24/2017	15894022586
40	6960957E412263AA671D4F7A15737527D71A7C08	Tushy	09/08/2017 22:40:10	09/08/2017	09/20/2017	PA0002052841
41	69AC2D8751ABF0FED5C443A1CE77A7C7529B7AC9	Vixen	05/10/2017 08:28:53	05/09/2017	06/22/2017	PA0002039298
42	6A53ECB874B094837053EB7B7142560F0A85A9C2	Vixen	09/22/2017 09:04:25	09/21/2017	09/28/2017	15894022962
43	6B9175E9708A1BE765BBDC6582A68A12E44A33E3	Vixen	07/14/2017 21:54:24	07/13/2017	08/10/2017	PA0002046873
44	72F519FE9EED3C466979E55CFEBF253309A8106C	Vixen	05/16/2017 12:11:02	05/14/2017	06/22/2017	PA0002039297
45	74C66B184CB3F25F69326EF0C5529CDB680A8C47	Vixen	05/25/2017 03:53:11	05/24/2017	06/22/2017	PA0002039294
46	7E4981D21DDD4B8D9EB5905B1B8A95461915A160	Blacked	08/24/2017 11:53:28	08/23/2017	08/24/2017	15894022831
47	807F407D94E9D91A368B24C5EEA7DBA5FF438450	Vixen	10/12/2017 19:03:36	06/28/2017	07/06/2017	15584691463
48	82EC6E9F2A9287FD59C2B571FDC0CDED7EDDBB81	Blacked	07/05/2017 04:24:38	06/29/2017	07/06/2017	15584063973
49	88D30B83D9E749F514380A5F2E9C3E876CF55431	Tushy	08/10/2017 10:01:43	08/09/2017	08/17/2017	15732986259
50	8D906EA439B8BF052A8D68240F71C6D9ACE1E17A	Vixen	07/05/2017 15:34:08	07/03/2017	07/06/2017	15584691415
51	8F55C47AC0C8FED6F30E2C094965B3CF4749FA41	Vixen	09/20/2017 09:40:12	08/27/2017	09/07/2017	PA0002052843
52	921AED6337A58B159CFAF9DADDFE2D91CDF8AB3	Tushy	08/12/2017 11:16:39	06/25/2017	07/06/2017	15584063333

Work	Hash	Site	UTC	Published	CRO App. File Date	CRO Number
53	9B5E94F7A0C627798E8020DFAA9A28609D1AB82A	Tushy	07/20/2017 21:27:58	07/20/2017	08/11/2017	PA0002046869
54	9C80B087C925D30BA01F72FC0EAABD8EAADF588A	Blacked	08/20/2017 09:20:56	08/18/2017	08/24/2017	15894022488
55	9D5513F0563852D9FB73EDC7D6318A6BB04334D9	Tushy	09/20/2017 11:43:04	09/18/2017	09/28/2017	15894022252
56	9E1EEE10CC32609ECC2542444366C4BBDC969CB5	Vixen	09/17/2017 09:29:18	09/16/2017	09/25/2017	15894022913
57	9E77DF7FCCB30D04DC6500C39CC3EF0AA2B48257	Blacked	09/06/2017 23:09:08	09/02/2017	09/07/2017	PA0002052847
58	ABDFB02F5D20E29C32ABCE90A8478787DDA3C11D	Tushy	06/12/2017 17:58:55	06/10/2017	07/06/2017	15583057070
59	AE6A89DD0FB4978EAC561028F9FB06AA0A8D7E6A	Tushy	05/10/2017 09:29:30	05/01/2017	06/15/2017	PA0002037577
60	AFA4C44023577E2A90E1CFA8DB69A6F5D035B1D2	Blacked	09/08/2017 22:15:20	09/07/2017	09/14/2017	PA0002052840
61	B2EC2056C7699F25A118F23E36BB74FC7D3B7131	Vixen	07/09/2017 14:25:35	07/08/2017	08/17/2017	15732903239
62	B80F62F292E7B77184DC0BCF80ECE23CF7B23D15	Tushy	09/29/2017 10:28:52	09/28/2017	10/10/2017	15894022733
63	BA56E328AE2DBA8A20B327451656293E37FDAE35	Blacked	05/16/2017 12:04:06	05/15/2017	06/22/2017	PA0002039283
64	C496C2BFE4C6D994F43DC665F2CBEE16FE85777A	Tushy	06/06/2017 10:39:33	06/05/2017	07/06/2017	15583057012
65	CB9ABC2B058CADE2FA7C0BD6A20558DC0E46EB0D	Blacked	06/24/2017 00:42:22	06/19/2017	07/06/2017	15584064069
66	D2B9C8834073E3BF4B55F7BF45C7EA7BE5903569	Blacked	05/31/2017 11:36:18	05/30/2017	06/22/2017	PA0002039295
67	DCE1E033042DA8E7CFC7CEC42B7D21201BEDFD57	Tushy	07/05/2017 13:13:53	06/30/2017	07/06/2017	15584063421
68	E132114F31A37161B83D12BCE6320B65DE025C9B	Vixen	06/20/2017 01:02:34	06/18/2017	07/06/2017	15584691891
69	E1C14843DC58F3CB2CCB7383B242E4EE8D32363B	Tushy	08/01/2017 00:20:55	07/25/2017	08/11/2017	PA0002046870
70	E272AF63D15A4277BF857E93B225717C76F3DA9D	Tushy	05/15/2017 07:43:19	05/11/2017	06/22/2017	PA0002039286

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71	E4BB4B0185636612E25A2955F474B4494789F63C	Blacked	10/12/2017 23:51:21	10/07/2017	10/22/2017	PA0002058300
72	E69BB37CE99BE570CC9EB659F45DDEF6E740E3BE	Blacked	08/14/2017 12:40:23	08/13/2017	08/17/2017	15732986356
73	EC31FAD9EF2492EACCD767B4A6E207BBF2765F0E	Blacked	09/13/2017 14:24:29	09/12/2017	09/20/2017	PA0002052846
74	F1132ADEB75DD2EA99B249DD70902C74E9DA7884	Tushy	09/03/2017 05:00:03	08/29/2017	09/07/2017	15894022439
75	F4A9F0567219CB991D41B5AD34DCA1CB04591497	Tushy	09/25/2017 11:19:11	09/23/2017	10/02/2017	15893930182
76	F77021A22716CC4E2F1154DBDF60A3891FF84DE1	Tushy	09/29/2017 10:33:06	07/05/2017	07/06/2017	PA0002041555
77	F8A92532C263D3E3497FF27A3FE569FF7BF15E37	Blacked	05/15/2017 06:09:04	04/25/2017	06/15/2017	PA0002037576
78	F8FEB2EE6C17B37610C5B2AE85F0266CB0C5C5BD	Blacked	07/05/2017 15:25:57	07/04/2017	07/06/2017	15584063685
79	FF7A5EE06C927438A3CAABC69D774D9CEACA8B9F	Tushy	07/17/2017 19:52:12	07/15/2017	08/10/2017	15711014757
80	FFD7D4C0A301487B3A11CBF1B3FC16410D42AEA0	Vixen	09/06/2017 23:08:24	09/06/2017	09/14/2017	PA0002052844

**CERTIFICATE OF SERVICE**

I am employed in the County of Washington, in the State of Oregon. I am over the age of 18 and not a party to the within action. My business address is 3699 NE John Olsen Ave, Hillsboro, Oregon 97124.

On June 19, 2018, I hereby certify that I served DEFENDANT’S REQUESTS FOR ADMISSION TO PLAINTIFF – SET ONE by delivering said document, by mail and email to:

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*Attorneys for Plaintiff Strike 3 Holdings LLC*

DATED this 19th day of June, 2018.

By: /s/ Kiren Rockenstein  
Kiren Rockenstein